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October 26, 2022

Hon. Vernon S. Broderick United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007

APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 10/26/2022

Re: United States v. Franzone 21 CR 446 (VSB)

Dear Judge Broderick,

I represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. I write to request permission for Mr. Franzone to travel to Delaware to meet with local counsel.

If granted, Mr. Franzone would take a train to Wilmington, Delaware this Friday, October 28, 2022, and would return by train to New York on Saturday, October 29, 2022.

I have conferred with Pretrial Services and with the Government, and I have been advised that Pretrial Services and the Government have no objection to the request to travel. Should the application be granted, Pretrial Services will be sent Mr. Franzone's itinerary.

I note that the Court granted Mr. Franzone's prior requests to travel. Orders, ECF # 29, #43, # 51, # 55.

Wherefore, I respectfully request that Mr. Franzone be permitted to travel to Delaware from Friday, October 28, 2022 to Saturday, October 29, 2022.

Thank you for your consideration.

Respectfully submitted,

Angela D. Lipsman, Esq

RUBINSTEIN & COROZZO, LLP

cc: AUSAs Alexander Rossmiller and Kiersten Fletcher (via ECF)
Pretrial Services Officer Jazzlyn Harris (via email)